

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:18-CV-68
	)	
UNITED STATES OF AMERICA, <i>et al.</i> ,	)	
	)	
Defendants,	)	
	)	
KARLA PEREZ, <i>et al.</i> ,	)	
	)	
Defendant-Intervenors,	)	
and	)	
	)	
STATE OF NEW JERSEY,	)	
	)	
Defendant-Intervenor.	)	

**DEFENDANT-INTERVENOR STATE OF NEW JERSEY’S  
UNOPPOSED MOTION TO EXCEED PAGE LIMITS**

Defendant-Intervenor State of New Jersey (“New Jersey”) respectfully requests that the Court grant it permission to exceed the 20-page limit for memoranda of law by 30 pages for its Memorandum of Law in Opposition to Plaintiffs’ Motion for Summary Judgment. Plaintiffs made a similar Motion To File Excess Pages (*see* Dkt. 625), and on January 31, 2023 Plaintiffs filed a 43-page Memorandum in support of their Motion for Summary Judgment (*see* Dkt. 625). New Jersey’s Memorandum of Law in Opposition will address complex issues in a case of national importance, and New Jersey requires these extra pages to adequately present these issues to the Court for adjudication. New Jersey seeks this extension for good cause and in the interest of justice, and no party will be prejudiced if the motion is granted.

Counsel for Plaintiffs, Federal Defendants, and the Perez Defendant-Intervenors have each indicated that they do not oppose this request.

**CONCLUSION**

New Jersey respectfully requests that the Court grant this Motion to Exceed Page Limits.

Dated: March 2, 2023

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/Mayur Saxena  
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State of New Jersey*

**CERTIFICATE OF CONFERENCE**

I certify that on January 30, 2023, counsel for the parties conferred regarding the relief requested in this motion and counsel for Plaintiffs, Federal Defendants, and the Perez Defendant-Intervenors each indicated that they do not oppose this motion.

/s/ Mayur Saxena

Mayur Saxena

**CERTIFICATE OF SERVICE**

I certify that on March 2, 2023, I caused this document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Mayur Saxena

Mayur Saxena